District I 1625 N. French Dr., Hobbs, NM 88240 District II 811 S. First St., Artesia, NM 88210 District III 1000 Rio Brazos Road, Aztec, NM 87410 1220 S. St. Francis Dr., Santa Fe, NM 87505

Alternative Method:

## State of New Mexico Energy Minerals and Natural Resources Department Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505

Form C-144 Revised June 6, 2013

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office.

For permanent pits submit to the Santa Fe
Environmental Bureau office and provide a copy
to the appropriate NMOCD District Office.

Pit, Below-Grade Tank, or
Proposed Alternative Method Permit or Closure Plan Application
Type of action:  Below grade tank registration Permit of a pit or proposed alternative method  Oll CONS. DIV DIST. 3
UN 16 2015 ☐ Closure of a pit, below-grade tank, or proposed alternative method ☐ Modification to an existing permit/or registration
Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method
Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request
Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.
Operator: BP America Production CompanyOGRID #:778
Address:200 Energy Court, Farmington, NM 87401
Facility or well name:Fields LS 8
API Number:3004520890 OCD Permit Number:
U/L or Qtr/QtrB_ Section29_ Township32N_ Range _11W_ County:San Juan_
Center of Proposed Design: Latitude36.960818 Longitude108.008305 NAD: □1927 ⋈ 1983
Surface Owner: 🛮 Federal 🗌 State 🔲 Private 🔲 Tribal Trust or Indian Allotment
2.  ☐ Pit: Subsection F, G or J of 19.15.17.11 NMAC
Temporary: Drilling Workover
Permanent ☐ Emergency ☐ Cavitation ☐ P&A ☐ Multi-Well Fluid Management Low Chloride Drilling Fluid ☐ yes ☐ no
Lined Unlined Liner type: Thickness mil LLDPE HDPE PVC Other
☐ String-Reinforced
Liner Seams: Welded Factory Other Volume: bbl Dimensions: L x W x D
3.
Volume:45.0bbl Type of fluid:Produced water
Tank Construction material:Steel
☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☒ Other _Single walled/double bottomed; side walls not visible
Liner type: Thicknessmil

Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

5. <b>Fencing:</b> Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)	
Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school, institution or church)	hospital,
Four foot height, four strands of barbed wire evenly spaced between one and four feet	
Alternate. Please specify	
6.	
Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks)	
☐ Screen ☐ Netting ☐ Other ☐ ☐ Monthly inspections (If netting or screening is not physically feasible)	
7. Signs: Subsection C of 19.15.17.11 NMAC	
☐ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers	
☐ Signed in compliance with 19.15.16.8 NMAC	
8.	
Variances and Exceptions:  Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.	
Please check a box if one or more of the following is requested, if not leave blank:	
<ul> <li>□ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.</li> <li>□ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.</li> </ul>	
9. Siting Criteria (regarding permitting): 19.15.17.10 NMAC Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptant material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.	ptable source
General siting	
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.  - □ NM Office of the State Engineer - iWATERS database search; □ USGS; □ Data obtained from nearby wells	Yes No
Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.  NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. (Does not apply to below grade tanks)  - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within the area overlying a subsurface mine. (Does not apply to below grade tanks)  - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
<ul> <li>Within an unstable area. (Does not apply to below grade tanks)</li> <li>Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map</li> </ul>	Yes No
Within a 100-year floodplain. (Does not apply to below grade tanks) - FEMA map	☐ Yes ☐ No
Below Grade Tanks	
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;.  - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	Yes No
Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)	
Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)  - Topographic map; Visual inspection (certification) of the proposed site	Yes No

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial	Yes No
application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.  NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 100 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pit Non-low chloride drilling fluid	
Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;  - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Permanent Pit or Multi-Well Fluid Management Pit	
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.  - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 500 feet of a wetland.  - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 N  Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the doc attached.  Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC  Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9  Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  Design Plan - based upon the appropriate requirements of 19.15.17.12 NMAC  Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19. and 19.15.17.13 NMAC	NMAC 15.17.9 NMAC
Previously Approved Design (attach copy of design) API Number: or Permit Number:	
Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC  Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the docattached.  Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC  Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC  A List of wells with approved application for permit to drill associated with the pit.  Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19 and 19.15.17.13 NMAC  Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC	
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC ☐ Previously Approved Design (attach copy of design) API Number: or Permit Number:	

Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC  Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the	documents are
attached.  ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC ☐ Climatological Factors Assessment ☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC ☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC ☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC ☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC ☐ Quality Control/Quality Assurance Construction and Installation Plan ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC ☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC ☐ Nuisance or Hazardous Odors, including H₂S, Prevention Plan ☐ Emergency Response Plan ☐ Oil Field Waste Stream Characterization ☐ Monitoring and Inspection Plan ☐ Erosion Control Plan ☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC	
13. Proposed Closure: 19.15.17.13 NMAC	
Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.  Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Multi-well Falternative  Proposed Closure Method: Waste Excavation and Removal Waste Removal (Closed-loop systems only) On-site Closure Method (Only for temporary pits and closed-loop systems) In-place Burial On-site Trench Burial Alternative Closure Method	Tuid Management Pit
14. Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be	attached to the
closure plan. Please indicate, by a check mark in the box, that the documents are attached.  Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC  Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC  Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)  Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	
15.	
Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. In 19.15.17.10 NMAC for guidance.	
Ground water is less than 25 feet below the bottom of the buried waste.  - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No
Ground water is more than 100 feet below the bottom of the buried waste.  - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	Yes No
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site	Yes No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application.  - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	105 NO

adopted pursuant to NMSA 1978, Section 3-27-3, as amended.  - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within the area overlying a subsurface mine Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
<ul> <li>Within an unstable area.</li> <li>Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map</li> </ul>	□ v□ v-
Within a 100-year floodplain.	Yes No
- FEMA map	Yes No
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plants are check mark in the box, that the documents are attached.  Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC  Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.  Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.13 NMAC  Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC  Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC  Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC  Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC	11 NMAC 15.17.11 NMAC
Operator Application Certification:	
I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and beli	ef.
Name (Print):	
Signature: Date:	
e-mail address:	
OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)  OCD Representative Signature:  Approval Date: 9/2/2  Title: OCD Permit Number:	<b>N</b> 5
Closure Report (required within 60 days of closure completion): 19.15.17.13 NMAC  Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not section of the form until an approved closure plan has been obtained and the closure activities have been completed.	
☐ Closure Completion Date:1/7/2011	
20. Closure Method:	
Waste Excavation and Removal ☐ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-lo ☐ If different from approved plan, please explain.	op systems only)

22.	
Operator Closure Certification:	
I hereby certify that the information and attachments submitted with this closure rebelief. I also certify that the closure complies with all applicable closure requirements.	
Name (Print):Jeff Peace	Title: Field Environmental Coordinator
Signature: Jeff Peace	Date:June 9, 2015
e-mail address:peace.jeffrey@bp.com	Telephone:(505) 326-9479

## BP AMERICA PRODUCTION COMPANY

SAN JUAN BASIN, NORTHWEST NEW MEXICO

#### BELOW-GRADE TANK CLOSURE PLAN

### Fields LS 8 <u>API No. 3004520890</u> Unit Letter B, Section 29, T32N, R11W

This plan will address the standard protocols and procedures for closure of below-grade tanks (BGTs) on BP America Production Company (BP) well sites. As stipulated in Paragraph A of 19.15.17.13 NMAC, BP shall close a BGT within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that the New Mexico Oil Conservation Division (NMOCD) requires because of imminent danger to fresh water, public health, safety or the environment. If deviations from this plan are necessary, any specific changes will be included on form C-144 and approved by the NMOCD. BP shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years after June 16, 2008, if not retrofit with a BGT that complies with the BP NMOCD approved BGT design attached to the BP Design and Construction Plan. BP shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC, if not previously retrofitted to comply with the BP NMOCD approve BGT Design attached to the BP Design and Construction Plan, prior to any sale or change in operator pursuant to 19.15.9.9 NMAC. BP shall close the permitted BGT within 60 days of cessation of the BGTs operation or as required by the transitional provisions of Subsection B, D, or E of 19.15.17.17 NMAC.

### **General Closure Plan**

- 1. BP shall notify the surface owner by certified mail that it plans to close a BGT. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records demonstrates compliance with this requirement.
  - No notice was made due to misunderstanding of the BGT notice requirements at that time.
- 2. BP shall notify the division District III office verbally or by other means at least 72 hours, but not more than one (1) week, prior to any closure operation. The notice shall include the operator's name, and the location to be closed by unit letter, section, township and range. If the BGT closure is associated with a particular well, then the notice shall also include the well's name, number and API number.
  - No notice was made due to misunderstanding of the BGT notice requirements at that time.
- 3. BP shall remove liquids and sludge from the BGT prior to implementing a closure method and dispose of the liquids and sludge in a NMOCD's division-approved facility. The facilities to be used are:
  - a. BP Crouch Mesa Landfarm, Permit NM-02-003 (Solids)
  - b. JFJ Landfarm, Permit NM-01-010(B) (Solids and Sludge)
  - c. Basin Disposal, Permit NM-01-0005 (Liquids)

- d. Envirotech Inc Soil Remediation Facility, Permit NM-01-0011 (Solids and Sludge)
- e. BP Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)
- f. BP Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
- g. BP Operated GCU 259 SWD, API 30-045-20006 (Liquids)
- h. BP Operated GCU 306 SWD, API 30-045-24286 (Liquids)
- i. BP Operated GCU 307 SWD, API 30-045-24248 (Liquids)
- j. BP Operated GCU 328 SWD, API 30-045-24735 (Liquids)
- k. BP Operated Pritchard SWD #1, API 30-045-28351 (Liquids)

All liquids and sludge in the BGT were removed and sent to one of the above NMOCD approved facilities for disposal.

4. BP shall remove the BGT and dispose of it in a NMOCD approved facility or recycle, reuse, or reclaim it in a manner that the NMOCD approves. If a liner is present and must be disposed of it will be cleaned by scraping any soils or other attached materials on the liner to a de minimus amount and disposed at a permitted solid waste facility, pursuant to Subparagraph (m) of Paragraph (1) of Subsection C of 19.15.35.8 NMAC. Documentation as to the final disposition of the removed BGT will be provided in the final closure report.

The BGT was transported to a storage area for sale and re-use.

5. BP shall remove any on-site equipment associated with a BGT unless the equipment is required for well production.

All equipment associated with the BGT has been removed.

6. BP shall test the soils beneath the BGT to determine whether a release has occurred. BP shall collect at a minimum: a five (5) point composite sample and individual grab samples from any area that is wet, discolored or showing other evidence of a release and analyze for BTEX, TPH and chlorides. The testing methods for those constituents are as follows;

Constituents	Testing Method	Release Verification	Sample
	45 bbl BGT	(mg/Kg)	results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	ND
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	ND
TPH	US EPA Method SW-846 418.1	100	ND
Chlorides	US EPA Method 300.0 or 4500B	250 or background	ND

Notes: mg/Kg = milligram per kilogram, BTEX = benzene, toluene, ethylbenzene, and total xylenes, TPH = total petroleum hydrocarbons. Other EPA methods that the division approves may be applied to all constituents listed. Chloride closure standards will be determined by which ever concentration level is greatest.

Soil under the BGT was sampled and TPH, BTEX and chloride levels were below the stated limits. Sampling data is attached.

- 7. BP shall notify the division District III office of its results on form C-141. **C-141 is attached.**
- 8. If it is determined that a release has occurred, then BP will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate.

  Sampling results indicate no release occurred.
- 9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then BP shall backfill the excavation, with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover, re-contour and re-vegetate the location. The location will be reclaimed if it is not with in the active process area

The area under the BGT was backfilled with clean soil and is still within the active well area.

10. BP shall reclaim the BGT location and all areas associated with the BGT including associated access roads to a safe and stable condition that blends with the surrounding undisturbed area. BP shall substantially restore the impacted surface area to the condition that existed prior to oil and gas operations by placement of the soil cover as provided in Subsection H of 19.15.17.13 NMAC, re-contour the location and associated areas to a contour that approximates the original contour and blends with the surrounding topography and re-vegetate according to Subsection I of 19.15.17.13 NMAC.

The area over the BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.

11. The soil cover for closures where the BGT has been removed or remediated to the NMOCD's satisfaction shall consist of the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater. The soil cover will be constructed to the site's existing grade and all practicable efforts will be made to prevent ponding of water and erosion of the cover material.

The area over the BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.

12. BP shall seed the disturbed area the first growing season after closure of the BGT. Seeding will be accomplished by drilling on the contour whenever practical or by other division-approved methods. Vegetative cover will be, at a minimum, 70% of the native perennial vegetative cover (un-impacted by overgrazing, fire or other intrusion damaging to native vegetation), consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintenance of that cover through two successive growing seasons. During the two growing seasons that prove viability, there shall be no artificial irrigation of the vegetation.

The area over the BGT is still within the active well area. This area will be reclaimed when the well is plugged and abandoned as part of final reclamation.

13. BP shall seed, plant and re-seed pursuant to Paragraph (3) of Subsection I of 19.15.17.13 NMAC, until the location successfully achieves the required vegetative cover.

BP will seed the area as part of final reclamation when the well is plugged and abandoned.

14. Pursuant to Paragraph (5) of Subsection I of 19.15.17.13 NMAC, BP shall notify the NMOCD when it has seeded or planted and when it successfully achieves revegetation.

BP will notify NMOCD when re-vegetation is successful.

- 15. Within 60 days of closure completion, BP shall submit a closure report on NMOCD's form C-144, and will include the following;
  - a. proof of closure notification (surface owner and NMOCD)
  - b. sampling analytical reports; information required by 19.15.17 NMAC;
  - c. disposal facility name and permit number
  - d. details on back-filling, capping, covering, and where applicable re-vegetation application rates and seeding techniques and
  - e. site reclamation, photo documentation.

    Closure report on C-144 form is included.
- 16. BP shall certify that all information in the report and attachments is accurate, truthful, and compliant with all applicable closure requirements and conditions specified in the approved closure plan.

Certification section of C-144 has been completed.

<u>District I</u> 1625 N. French Dr., Hobbs, NM 88240 District II 811 S. First St., Artesia, NM 88210 District III 1000 Rio Brazos Road, Aztec, NM 87410 <u>District IV</u> 1220 S. St. Francis Dr., Santa Fe, NM 87505

## State of New Mexico Energy Minerals and Natural Resources

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505

Form C-141

Revised August 8, 2011

			Rel	ease Notific	catio	n and Co	orrective A	ction				
							TOR		Initi	al Report	$\boxtimes$	Final Repor
Name of Co	ompany: B	SP.				Contact: Jeff Peace						
Address: 20	00 Energy	Court, Farm	ington, N	IM 87401		Telephone No.: 505-326-9479						
Facility Na	me: Fields	LS 8				Facility Typ	e: Natural gas	well				
Surface Ow	ner: Feder	ral		Mineral (	Owner:	Federal		A	PI No	. 3004520	890	
				LOCA	ATIO	N OF RE	LEASE	•				
Unit Letter	Section	Township	Range	Feet from the		/South Line	Feet from the	East/West	Line	County: S	San Iua	n
В	29	32N	11W	850	North		1,700	East	Bine	County. E	ran saa	
		Latit	tude 36	.960818		Longitud	e 108.008305					
Tyma of Dala	0.001 0.000			NAI	UKE	OF REL		17.	1 T	2 1 7	D T / A	
Type of Rele		w grade tank -	- 45 hbl				Release: N/A  Hour of Occurrence			Recovered: Hour of Dis		7*
	Was Immediate Notice Given?					If YES, To		. Dai	ic and	Hour of Di	scovery	"-
			Yes [	No Not R	equired		, , , , , , , , , , , , , , , , , , , ,					
By Whom?						Date and F	Iour					
Was a Watercourse Reached?					If YES, Vo	olume Impacting t	the Watercou	ırse.				
☐ Yes ☒ No												
If a Watercon	ırse was Im	pacted, Descr	ibe Fully.	*								
Describe Cau	ise of Probl	em and Reme	dial Actio	n Taken.* Sampli	ng of th	ne soil beneath	the BGT was do	ne during ren	noval :	to ensure no	soil ir	nnacts from
				and chloride belo					110 vai	to chistic ne	7 3011 111	iipacts iroiii
	-											
Describe Are	a Affected	and Cleanup	Action Tak	cen.* BGT was re	moved	and the area ii	nderneath the BG	T was samnl	led T	he area und	er the F	RGT was
				active well area.	moved	and the area u	nderneath the Bo	r was sampi	icu. Ti	ne area und	of the L	or was
I hereby certi	fy that the i	information gi	ven ahove	e is true and comp	lete to t	he hest of my	knowledge and u	inderetand the	at nure	mant to NM	OCD r	ules and
				nd/or file certain r								
public health	or the envi	ronment. The	acceptance	ce of a C-141 repo	ort by th	e NMOCD m	arked as "Final R	eport" does n	not reli	eve the ope	rator of	f liability
				investigate and r								
or the environ	nment. In a	iddition, NMC ws and/or regu	OCD accep	tance of a C-141	report c	loes not reliev	e the operator of	responsibility	y for co	ompliance v	vith any	y other
rederal, state,	or rocar ra	ws and/or regu	nations.				OIL CONS	SERVAT	ION	DIVISIO	M	
(	00	1					OIL COIN	BLICY AT.	ION	DIVISIO	714	
Signature:	VAG	Poses										
Printed Name	· Jeff Peace	9				Approved by	Environmental S	pecialist:				
1 Timed Ivalite	. Jell I cac	0										
Title: Field E	nvironment	al Coordinato	r			Approval Dat	e:	Expir	Expiration Date:			
E mail 4.4.4	ant nesse !	ffray@hm ===	n			Conditions - 4	Annough					
E-mail Addre	ss. peace.je	effrey@bp.cor	11			Conditions of	Approvai:			Attached		
Date: June 9	, 2015		Phone: 50:	5-326-9479								

<sup>\*</sup> Attach Additional Sheets If Necessary

CLIENT: BP	BLAGG ENGIN P.O. BOX 87, BLOO		API#: 3004520890
	(505) 632	-1199	
FIELD REPORT:	BGT CONFIRMATION TEMP. PIT CL (other)	OSURE / RELEASE INVESTIGATION	PAGE No:1 of1_
SITE INFORMATION	: SITE NAME: FIELDS L	_S #8	DATE STARTED: 12/17/10
QUAD/UNIT: B SEC: 29 TW	P: <b>32N</b> RNG: <b>11W</b> PM: <b>NN</b>	CNTY: SJ ST: NM	DATE FINISHED:
QTR-QTR/F00TAGE: 850'N / 1,	700'E NW/NE LEASE TYPE	FEDERAL STATE / FEE / INDIAN	ENVIRONMENTAL
LEASE #: NM010989	PROD. FORMATION: PC CO	ELKHORN ONTRACTOR: MBF - J. WILLBORN	SPECIALIST: NJV
REFERENCE POINT	: WELL HEAD (W.H.) GPS CO	OORD.: 36.96086 X 108.0	00834 GLELEV: 6,592'
	GPS COORD.: 36.9608		CE/BEARING FROM W.H.: 18', S20E
2)	GPS COORD.:	DISTANC	CE/BEARING FROM W.H.:
3)	GPS COORD.:	DISTANC	CE/BEARING FROM W.H.:
4)	GPS COORD.:	DISTANC	CE/BEARING FROM W.H.:
LAB INFORMATION:	CHAIN OF CUSTODY RECO	DRD(S): HALL	OVM READING (ppm)
1) SAMPLE ID: 5PC - TB @ 5' (45 BB	L BGT) SAMPLE DATE: 12/17/10	SAMPLETIME: 1142 LAB ANALYSIS: 418	8.1/8015B/8021B/300.0 (CI) NA
2) SAMPLE ID:	SAMPLE DATE:	SAMPLE TIME: LAB ANALYSIS:	
3) SAMPLE ID:	SAMPLE DATE:	SAMPLE TIME: LAB ANALYSIS:	
4) SAMPLE ID:	SAMPLE DATE:	SAMPLE TIME: LAB ANALYSIS:	
SOIL DESCRIPTION	SOIL TYPE: SAND SILTY SA	AND SILT SILTY CLAY CLAY / GRAVEL	/ OTHER
SOIL COLOR: DARK Y COHESION (ALL OTHERS): NON COHESIVE SLIGHTLY			STIC COHESIVE MEDIUM PLASTIC / HIGHLY PLASTIC
CONSISTENCY (NON COHESIVE SOILS): LC MOISTURE: DRY SLIGHTLY MOIST MOIST / W SAMPLE TYPE: GRAB COMPOSITE - # DISCOLORATION/STAINING OBSERVED	ET / SATURATED / SUPER SATURATED  OF PTS	DENSITY (COHESIVE CLAYS & SILTS): \$ HC ODOR DETECTED: YES NO E	SOFT FIRM STIFF VERY STIFF / HARD
ANY AREAS DISPLAYING WETNESS: YES NO ADDITIONAL COMMENTS: NO APPARE	-	RVED FROM BGT.	
EXCAVATION DIMENSIONS (if applicable	): NA ft. X NA	ft. X NA ft. cubic yar	ds excavated (if applicable):
SITE SKETCH		PLOT PLAN circle: attached	OWN CALIB/READ. = / DDM DE /SO
METE RUN	R WELL HEAD	N PBGTL	OVM CALIF.READ. =
	FENCE BERM	─T.B. ~ 5' B.G.	BGT SIDEWALLS NOT VISIBLE SW - SINGLE WALLED DB - DOUBLE BOTTOM
	TON DEPRESSION; B.G. = BELOW GRADE; B = BELO		Magnetic declination: 10° E
T.B. = TANK BOTTOM; PBGTL = PREVIOUS BE TRAVEL NOTES: CALLOUT:	ELOW-GRADE TANK LOCATION; SPD = SAMPLE POI 12/15/10 - After.	NT DESIGNATION; R.W. = RETAINING WALL.  ONSITE: 12/17/10 - Late N	

revised: 10/02/10 BEI1005E-2.SKF

# Hall Environmental Analysis Laboratory, Inc.

Date: 07-Jan-11

CLIENT:

Blagg Engineering

Lab Order:

1012864

Project:

Fields LS #8

Lab ID:

1012864-01

Client Sample ID: 5PC-TB@5'-45 BBL BGT

Collection Date: 12/17/2010 11:42:00 AM

Date Received: 12/22/2010

Matrix: SOIL

Analyses	Result	PQL	Qual U	Inits	DF	Date Analyzed
EPA METHOD 8015B: DIESEL RANGE	ORGANICS		<del>,</del>		7.44	Analyst: JB
Diesel Range Organics (DRO)	ND	10	m	ng/Kg	1	1/3/2011 11:39:48 AM
Surr: DNOP	92.7	81.8-129	9/	6REC	1	1/3/2011 11:39:48 AM
EPA METHOD 8015B: GASOLINE RANG	SE .					Analyst: NSB
Gasoline Range Organics (GRO)	ND	5.0	m	ıg/Kg	1	12/28/2010 5:05:47 PM
Surr: BFB	98.4	89.7-125	%	REC	1	12/28/2010 5:05:47 PM
EPA METHOD 8021B: VOLATILES						Analyst: NSB
Benzene	ND	0.050	m	ıg/Kg	1	12/28/2010 5:05:47 PM
Toluene	ND	0.050	m	g/Kg	1	12/28/2010 5:05:47 PM
Ethylbenzene	ND	0.050	m	g/Kg	1	12/28/2010 5:05:47 PM
Xylenes, Total	ND	0.10	m	g/Kg	1	12/28/2010 5:05:47 PM
Surr: 4-Bromofluorobenzene	112	88.9-151	%	REC	1	12/28/2010 5:05:47 PM
EPA METHOD 300.0: ANIONS						Analyst: SRM
Chloride	ND	7.5	m	g/Kg	5	12/27/2010 11:39:50 PM
EPA METHOD 418.1: TPH						Analyst: JB
Petroleum Hydrocarbons, TR	ND	20	m	g/Kg	1	12/29/2010

#### Qualifiers:

- Value exceeds Maximum Contaminant Level
- Estimated value
- Analyte detected below quantitation limits
- NC Non-Chlorinated
- PQL Practical Quantitation Limit

- Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- MCL Maximum Contaminant Level
- ND Not Detected at the Reporting Limit
- Spike recovery outside accepted recovery limits

Date: 07-Jan-11

# **QA/QC SUMMARY REPORT**

Client:

Blagg Engineering

Project:

Fields LS #8

Work Order:

1012864

Project: Fleids LS #	0								Work	Order:	1012864
Analyte	Result	Units	PQL	SPK Val S	PK ref	%Rec I	_owLimit H	ighLimit	%RPD	RPDLimi	t Qual
Method: EPA Method 300.0: A	nions	10									
Sample ID: MB-25014		MBLK				Batch ID:	25014	Analys	is Date:	12/27/2010	5:51:39 PM
Chloride	ND	mg/Kg	1.5								
Sample ID: LCS-25014		LCS				Batch ID:		Analys	is Date:	12/27/2010	6:09:04 PN
Chloride	14.18	mg/Kg	1.5	15	0	94.5	90	110	r 1		
Method: EPA Method 418.1: T	PH										
Sample ID: MB-25004		MBLK				Batch ID:	25004	Analys	is Date:		12/29/2010
Petroleum Hydrocarbons, TR	ND	mg/Kg	20								
Sample ID: LCS-25004		LCS				Batch ID:	25004	Analysi	is Date:		12/29/2010
Petroleum Hydrocarbons, TR	96.90	mg/Kg	20	100	0	96.9	86.8	116			
Sample ID: LCSD-25004		LCSD				Batch ID:	25004	Analysi	is Date:		12/29/2010
Petroleum Hydrocarbons, TR	98.18	mg/Kg	20	100	0	98.2	86.8	116	1.31	16.2	
Method: EPA Method 8015B: D	Diesel Range	Organics									
Sample ID: 1012864-01AMSD		MSD				Batch ID:	25044	Analysi	s Date:	1/3/2011 1	2:52:10 PM
Diesel Range Organics (DRO)	50.56	mg/Kg	10	50	0	101	57.5	128	5.11	19.7	
Sample ID: MB-25044		MBLK				Batch ID:	25044	Analysi	s Date:	1/3/2011	9:57:28 AM
Diesel Range Organics (DRO)	ND	mg/Kg	10								
Sample ID: LCS-25044		LCS				Batch ID:	25044	Analysis	s Date:	1/3/2011 1	0:31:34 AM
Diesel Range Organics (DRO)	45.92	mg/Kg	10	50	0	91.8	66.2	120			
Sample ID: LCSD-25044		LCSD				Batch ID:	25044	Analysis	s:Date:	1/3/2011 1	1:05:42 AM
Diesel Range Organics (DRO)	48.92	mg/Kg	10	50	0	97.8	66.2	120	6.33	14.3	
Sample ID: 1012864-01AMS		MS				Batch ID:	25044	Analysis	s Date:	1/3/2011 1	2:13:58 PM
Diesel Range Organics (DRO)	48.04	mg/Kg	10	50	0	96.1	57.5	128			
Method: EPA Method 8015B: G	asoline Ran	αe									
Sample ID: MBLK-24987		MBLK				Batch ID:	24987	Analysis	Date:	12/24/2010	4:39:10 AM
Gasoline Range Organics (GRO)	ND	mg/Kg	5.0								
Sample ID: LCS-24987		LCS				Batch ID:	24987	Analysis	Date:	12/24/2010	4:09:14 AM
Gasoline Range Organics (GRO)	25.57	mg/Kg	5.0	25	0	102	95.7	120			
		0.0									

Q	u	a	1	į	fī	e	r	S	
A.				-		-	•	-	

E Estimated value

ND Not Detected at the Reporting Limit

R RPD outside accepted recovery limits

Page 1

J Analyte detected below quantitation limits

H Holding times for preparation or analysis exceeded

NC Non-Chlorinated

Date: 07-Jan-11

# **QA/QC SUMMARY REPORT**

Client:

Blagg Engineering

Project:

Fields LS #8

Work Order:

1012864

Result	Units	PQL	SPK V	al SPK ref	%Rec LowLimit HighLimit		%RPD	RPDLimit	Qual	
latiles										
	MSD				Batch ID:	24987	Analysi	s Date:	12/28/2010	6:05:51 P
0.9219	mg/Kg	0.050	1	0	92.2	67.2	113	1.31	14.3	
0.8868	mg/Kg	0.050	1	0.0175	86.9	62.1	116	1.88	15.9	
0.9508	mg/Kg	0.050	1	0	95.1	67.9	127	1.83	14.4	
2.959	mg/Kg	0.10	3	0	98.6	60.6	134	2.35	12.6	
	LCS				Batch ID:	24987	Analysis	s Date:	12/28/2010 3	3:35:32 PI
1.023	mg/Kg	0.050	1	0	102	83.3	107			
0.9712	mg/Kg	0.050	1	0	97.1	74.3	115			
1.021	mg/Kg	0.050	1	0	102	80.9	122			
3.194	mg/Kg	0.10	3	0	106	85.2	123			
	MS				Batch ID:	24987	Analysis	Date:	12/28/2010 5	:35:49 PM
0.9099	mg/Kg	0.050	1	0	91.0	67.2	113			
0.8703	mg/Kg	0.050	1	0.0175	85.3	62.1	116			
0.9336	mg/Kg	0.050	- 1	0	93.4	67.9	127			
2.890	mg/Kg	0.10	3	0	96.3	60.6	134			
	0.9219 0.8868 0.9508 2.959 1.023 0.9712 1.021 3.194 0.9099 0.8703 0.9336	MSD	### MSD    0.9219   mg/Kg   0.050     0.8868   mg/Kg   0.050     0.9508   mg/Kg   0.050     2.959   mg/Kg   0.10     LCS     1.023   mg/Kg   0.050     0.9712   mg/Kg   0.050     1.021   mg/Kg   0.050     3.194   mg/Kg   0.10     MS     0.9099   mg/Kg   0.050     0.8703   mg/Kg   0.050     0.9336   mg/Kg   0.050     0.9336   mg/Kg   0.050     0.050	MSD	MSD	MSD	MSD	MSD	MSD	Batch   D:   24987   Analysis Date:   12/28/2010   60.9219   mg/Kg   0.050   1   0   92.2   67.2   113   1.31   14.3   1.34   1.35   0.8868   mg/Kg   0.050   1   0.0175   86.9   62.1   116   1.88   15.9   1.89   1.959   mg/Kg   0.10   3   0   98.6   60.6   134   2.35   12.8   1.023   mg/Kg   0.050   1   0   102   83.3   107   1.023   mg/Kg   0.050   1   0   102   83.3   107   1.021   mg/Kg   0.050   1   0   97.1   74.3   115   1.021   mg/Kg   0.050   1   0   102   80.9   122   3.194   mg/Kg   0.10   3   0   106   85.2   123   Batch   D:   24987   Analysis Date:   12/28/2010   50.9099   mg/Kg   0.050   1   0   91.0   67.2   113   116   0.9336   mg/Kg   0.050   1   0   93.4   67.9   127   127   1.83   14.4   1.88   15.9   127   1.83   14.4   1.88   15.9   12.88

Qualifiers:

E Estimated value

J Analyte detected below quantitation limits

ND Not Detected at the Reporting Limit

H Holding times for preparation or analysis exceeded

NC Non-Chlorinated

R RPD outside accepted recovery limits

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# Hall Environmental Analysis Laboratory, Inc.

# Sample Receipt Checklist

Client Name BLAGG		Date Received:	12/22/2010
Work Order Number 1012864		Received by: AMG	h -/
Checklist completed by:	12 02 10 Dale	Sample ID labels checked by:	Initials
Matrix:	Carrier name: Priority US Mai		
Shipping container/cooler in good condition?	Yes 🗸	No Not Present	]
Custody seals intact on shipping container/cooler?	Yes 🗸	No Not Present	Not Shipped
Custody seals intact on sample bottles?	Yes	No □ N/A ✓	
Chain of custody present?	Yes 🗹	No 🗔	
Chain of custody signed when relinquished and receive	ed? Yes 🗹	No 🗀	
Chain of custody agrees with sample labels?	Yes 🗹	No 🗌	
Samples in proper container/bottle?	Yes 🗸	No 🗆	
Sample containers intact?	Yes 🗸	No 🗌	
Sufficient sample volume for indicated test?	Yes 🗸	No 🗀	
All samples received within holding time?	Yes 🗸	No 🗌	Number of preserved bottles checked for
Water - VOA vials have zero headspace? No	VOA vials submitted 🗹	Yes 🗌 No 🗀	pH:
Water - Preservation labels on bottle and cap match?	Yes 🗀	No ☐ N/A 🗹	
Water - pH acceptable upon receipt?	Yes 🗌	No ☐ N/A 🗹	<2 >12 unless noted below.
Container/Temp Blank temperature?		6° C Acceptable	
COMMENTS:	IT	given sufficient time to cool.	
Client contacted Date of	contacted:	Person contacted	
Contacted by: Regar	ding:		
Comments:	NIELEND DO	12/23/10.05K	ed to
Comments: Stoke with	date should	y pe 19/17/10	12/23/10
			9
Corrective Action			
		2	

Chain-of-Custody Record	Turn-Around Time:	
Client: BLAGG ENGR.   BP AMERICA	Standard Rush HALL ENVIRONMENTAL ANALYSIS LABORATORY	
	Project Name: www.hallenvironmental.com	
Mailing Address: P.O. Box 87	FIELDS LS 井る 4901 Hawkins NE - Albuquerque, NM 87109	
BLFO., NM 87413	Project #: Tel. 505-345-3975 Fax 505-345-4107	
BLFO., NM 87413 Phone #: (505) 632-1199	Analysis Request	
email or Fax#:	Project Manager: $7 \cup 2 \bigcirc 2$	
QA/QC Package:  Standard  Level 4 (Full Validation)	Nerzon   N	-
Accreditation  □ NELAP  □ Other	anneadure Solution of Composition of	(N)
□ EDD (Type)	Sample Temperature S of d d d s la	2
Date Time Matrix Sample Request ID	BTEX+MTBE + TMB's (80218)  BTEX+MTBE + TMB's (80218)  BTEX + MTBE + TPH (Gas only)  TPH (Method 8015B (Gas/Diesel TPH (Gas only))  TPH (Method 418.1)  EDB (Method 504.1)  B310 (PNA or PAH)  RCRA 8 Metals  Anions (F,CI,NO <sub>3</sub> ,NO <sub>2</sub> ,PO <sub>4</sub> ,SO <sub>4</sub> )  8260B (VOA)  8260B (VOA)  SAMPLE  SAMPLE	Air Bubbies (Y or N)
14/6/10 1142 501L SPC-TB @5 -	40z1 Cool -1/ //	
		_
		_
		_
Date: Time: Relinquished by:	Received by: Date Time Remarks:	
Date: Time: Relinquished by:    Zz    10   1445	Received by:  Date Time Remarks:  TPH (8015B) - DRO J GRO ONLY  Received by:  Date Time	



